

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION

In Re:

David Dolliver Lafferty
Rebecca Lynn Lafferty

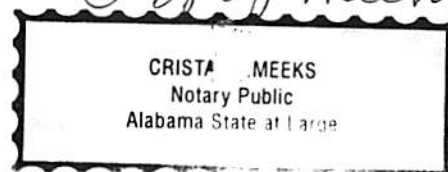
Case No.: 17-80607—CRJ13
Chapter: 13
Judge: Jessup

AFFIDAVIT IN SUPPORT OF MOTION TO INCUR DEBT

I, Joseph G. Pleva, attorney for debtors in the above referenced case, do hereby state under penalty of perjury:

1. Debtors have obtained financing for the refinance of the first and second mortgages on their principal residence from Southern Mortgage Group.
2. Southern Mortgage Group is a mortgage broker whose principal place of business is in Huntsville, AL and who provides mortgage services to residential customers in the Greater Huntsville area.
3. Southern Mortgage Group maintains offices in the Bellchase Office Center at 3330 L and N Dr., Huntsville, AL, in the same building and down the hall from Debtor's counsel's offices.
4. Southern Mortgage Group owns a suite of offices in the Bellchase Office Center. They subdivided their suite into smaller office suites and lease one of those suites to Debtor's counsel's law firm.
5. Notwithstanding the above, Southern Mortgage Group provides a service that Debtor's counsel's law firm is often in need of, namely providing financing to individuals seeking to purchase real estate or refinance mortgages.
6. Debtor's counsel's law firm does not receive any remuneration from Southern Mortgage Group. Debtor's counsel's law firm uses them as a vendor due to the convenience of their location to clients in need of their services.

Dated: November 20, 2019



My Commission Expires
August 24, 2020